

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	CRIMINAL No.
v.)	
)	
)	03-CR-10331 (RGS)
IVAN VELEZ)	
Defendant.)	

GOVERNMENT'S LIST OF POTENTIAL EXHIBITS

The United States of America, through its attorneys, Michael J. Sullivan, United States Attorney for the District of Massachusetts and Assistant U.S. Attorneys Cynthia W. Lie and Suzanne Sullivan, hereby files the following List of Potential Exhibits for the trial in the above-captioned matter. The government reserves its right to supplement or modify the list with reasonable notice to the defendants:

Exhibit	Description
1	Chart of Participants
2	Black Market Exchange Chart
3	USCL Sovereign Bank Account 30900001923 Account Opening Forms and Records
4	Navarro Sovereign (originally Fleet) Bank Account 3090015598 Account Opening Forms and Records
5	Bank Photos of Oscar Patino

6	Deposit Slips into USCL Account 30900001923 Records
7	Sovereign Bank Branch Identifying Records
8	Chart of Cash Deposits of Patino
9	Money Order Deposits into USCL Account 30900001923 and Navarro Account 3090015598
10	Chart of Money Order Deposits into USCL Account 30900001923 and Navarro Account 3090015598
11	Third Party Checks Deposited into USCL Account 30900001923
12	Record of Wire Transfer From Grande to USCL Account
13	Grande City National Bank Account 140919417 Records
14	Gordillo/Grande Washington Mutual Account 389- 205591-0 Records
15	Opt 4 Citibank Statement 5/7/01 - 6/6/01
16	Nextel Bill for May 4-June 3, 2001 for telephone numbers: 781 858 1678 781 858 1679 781 858 1680
17	GES telephone records for 305-639-2729
18	Tape-34: Consensual Recording between Patino and Velez
19	Tape-35: Consensual Recording between Patino and Velez
20	Tape-36: Consensual Recording between Patino and Velez
21	Tape-37: Consensual Recording between Patino and Velez
22	English/Spanish Transcript for Tape 34

23	English/Spanish Transcript for Tape 35
24	English/Spanish Transcript for Tape 36
25	English/Spanish Transcript for Tape 37
26	Email dated May 28, 2001 between Patino and Navarro and Records concerning \$63,446.10 wire transfer from Sovereign Bank USCL Account to Juki Union
27	Ivan Velez Bank of America Account 0034 3018 2823 Records
28	General Express Services Bank of America Account 0030 6732 0115 Records
29	Tax Returns for Ivan Velez
30	Tax Returns for General Express Services
31	May 23c, 2001 email between Patino and Navarro
32	May 27, 2001 email between Patino and Navarro
33	Money Order Closeout Reports Money Order Closeout Report Section
34	Triboro Checking Branch Locations
35	PLEA AGREEMENT FOR CLAUDIA NAVARRO
36	PLEA AGREEMENT OSCAR PATINO
37	PLEA AGREEMENT VARUGHESE VARUGHESE
38	Emails between Patino and Velez from March 15, 16, 30, 2004

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Cynthia W. Lie

CYNTHIA W. LIE
SUZANNE M. SULLIVAN
Assistant U.S. Attorneys

Dated: January 23, 2006